- 1		
1 2 3 4 5 6	SUE A. GALLAGHER, City Attorney (SBN 1214) ROBERT L. JACKSON, Assistant City Attorney ( City of Santa Rosa 100 Santa Rosa Avenue, Room 8 Santa Rosa, California 95404 Telephone: (707) 543-3040 Facsimile: (707) 543-3055 Attorneys for Defendant City of Santa Rosa	69) SBN 101770)
7		
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIF	ORNIA - San Francisco Division
10		
1	NICHOLLE VANNUCCI, ELLEN BROWN and DEBORAH DRAKE,	CASE NO. 3:18-CV-01955-VC
12	individuals; and HOMELESS ACTION!, an unincorporated	DECLARATION OF SUE A. GALLAGHER IN OPPOSITION
13	association,	TO MOTION TO ENFORCE AND CLARIFY PRELIMINARY
14	Plaintiffs,	STIPULATED INJUNCTION
15	V.	
l6 l7 l8 l9	COUNTY OF SONOMA, SONOMA COUNTY COMMUNITY DEVELOPMENT COMMISSION, CITY OF SANTA ROSA, and DOES I to XX,  Defendants.	Date: December 3, 2020 Time: 10:00 a.m. Ctrm: 4, 17 <sup>th</sup> Floor Judge: The Hon. Vince Chhabria
20		
21	I, Sue A. Gallagher, declare as follows:	
22	1. I have personal knowledge of the facts set forth in this declaration and if called as	
23	a witness could and would competently testify thereto.	
24	2. I am the City Attorney for the City of Santa Rosa. I am a member of and regularly	
25	attend the Homeless Action Team (HAT) and Homeless Encampment Assistance Program	
26	(HEAP) team meetings. I work closely with Rob Jackson, the Assistant City Attorney in our	
27	office tasked with defense of this lawsuit. I advise the Mayor and the City Council on the legal	
28	aspects of the City's efforts to address crisis of homelessness in Santa Rosa.	
ļ	1	

3. On Thursday, May 21, 2020 I conferred with Bruce Goldstein, County Counsel for Sonoma County regarding the City's proposed enforcement and efforts to close growing homeless encampments. The City was cognizant of CDC COVID 19 Guidelines discouraging closure of homeless encampments, but was finding health, fire and safety hazards at encampments in Doyle Park and in Highway 101 underpasses were escalating dramatically. I spoke with Mr. Goldstein to elicit if the County, particularly the County Health Officer, understood the competing health and safety concerns with which we were faced, our focus on the welfare of the residents at the encampments, as well as the community at large, and to elicit if the County, the County Department of Health, or the County Public Health Officer had any objections with closure of the encampments. Mr. Goldstein advised me that he understood the situation and that the County Counsel, County Health Department and County Public Health Officer had no objection.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 3, 2020, Santa Rosa, California.

SUE A. GALLAGHER